

To: Burke, Thomas[Burke.Thomas@epa.gov]
Cc: Sarah Amick[SAmick@rma.org]
From: Tracey Norberg
Sent: Mon 10/3/2016 6:21:21 PM
Subject: Meeting Request re: Crumb Rubber Research Protocol
[RMA Dr Thomas Burke EPA 10-03 2016.pdf](#)

Dear Dr. Burke,

Please find attached a letter requesting a meeting with you and your staff regarding the EPA research protocol on crumb rubber infill from synthetic turf fields. The Rubber Manufacturers Association (RMA) would like to discuss some recommended changes to the sampling techniques outlined in the research protocol. As described in the letter, scientists from Cardno ChemRisk have significant expertise and experience in this field of research, and we would like to open a dialogue between them and your office. Our aim is to assist the Agency in assuring the robustness of the EPA study.

I will be in touch later this week to schedule a time for this meeting. Thanks so much for your time.

Best regards,

Tracey J. Norberg

Senior Vice President & General Counsel

Rubber Manufacturers Association

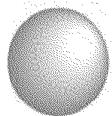
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October 3, 2016

Dr. Thomas Burke
Science Advisor and Deputy Assistant Administrator
Office of Research and Development
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Mail Code: 8101R
Washington, DC 20460

Dear Dr. Burke,

The Rubber Manufacturers Association¹ requests a meeting with you and your staff regarding the U.S. Environmental Protection Agency's (EPA) Research Protocol: Collections Related to Synthetic Turf Fields with Crumb Rubber Infill (August, 2016). RMA supports EPA's research on crumb rubber and we are committed to assisting the agency in its efforts to ensure the study is as robust as possible and well positioned to answer a broad suite of questions on the safety on synthetic turf fields.

Based on the industry's expertise in characterizing the potential environmental health risk related to tire and road wear particles, we recommend that some aspects of EPA's protocol be revised to provide a better understanding of the potential health risk from tire crumb rubber infill. In particular, we would like to discuss recommendations for additional surface soil samples, the most appropriate analytical techniques for evaluating crumb rubber and international sources of data available to determine the availability of toxicity data and health-based screening levels.

The global tire industry has conducted extensive research on tire and road wear particles through the Tire Industry Project, working under the umbrella of the World Business Council for Sustainable Development (WBCSD). We believe that this body of research offers key learnings that can be of significant value to EPA as it finalizes its research protocol. To facilitate an open scientific dialogue between EPA and Tire Industry Project researchers, RMA would like our consultants at Cardno ChemRisk to offer their scientific expertise, experience and insights during the meeting. We are hoping that this

¹ The Rubber Manufacturers Association (RMA) is the national trade association representing major tire manufacturers that produce tires in the United States, including Bridgestone Americas, Inc., Continental Tire the Americas, LLC; Cooper Tire & Rubber Company; The Goodyear Tire & Rubber Company; Kuhmo Tire Co., Inc.; Michelin North America, Inc.; Pirelli Tire North America; Sumitomo Rubber Industries, Ltd.; Toyo Tire Holdings of Americas Inc. and Yokohama Tire Corporation.

input will help to enhance the EPA study.

Cardo ChemRisk scientists have been studying the chemical composition, fate in the environment and potential effects on human health of tire and road wear particles for the Tire Industry Project since 2005. Since 2006, the Tire Industry Project, through Cardo ChemRisk, has initiated work on the evaluation of chemicals commonly used in tire making for any potential health and/or environmental impacts; the properties, fate and impacts of tire and road wear particles generated during normal tire use and wear; the management of tires at the end of their useful lives; and the safe development and use of nanomaterials in the tire industry.

We look forward to meeting with EPA at your earliest convenience. RMA will contact your office on Thursday, October 6th to work with your staff to schedule a meeting.

Best Regards,

A handwritten signature in black ink, appearing to read "Tracey Norberg". The signature is fluid and cursive, with a large, stylized "T" and "N".

Tracey Norberg
Senior Vice President and General Counsel